

May 15, 2025

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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US BANKRUPTCY COURT
DISTRICT OF DELAWARE

**YELLOW CORPORATION, et al.,(1)
Debtors**

**Chapter 11
Case # 23-11069 (CTG)
(Jointly Administered)**

Notice of Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an order converting the Debtors' Chapter 11 cases to cases Under Chapter 7 of the Bankruptcy Code.

To Whom This May Concern:

Objection to Motion to Convert the Debtors' Chapter 11 cases to cases under Chapter 7 of the Bankruptcy Code.

I Clifton Branton, a Yellow Corporation employee of (24) years, Object to the Motion to Convert the Debtors' Chapter 11 cases to cases under Chapter 7 of the Bankruptcy Code.

Thanks



**Clifton Jerome Branton
4442 Blackwater Cove
Ellenwood, Georgia 30294
404-435-1463**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION, *et al.*,¹
Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

Hearing Date: June 16, 2025 at 10:00 a.m. (ET)

Objection Deadline: May 20, 2025 at 4:00 p.m. (ET)

**NOTICE OF MOTION OF MFN PARTNERS, LP AND MOBILE
STREET HOLDINGS, LLC FOR ENTRY OF AN ORDER
CONVERTING THE DEBTORS' CHAPTER 11 CASES TO CASES
UNDER CHAPTER 7 OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that MFN Partners, LP and Mobile Street Holdings, LLC filed the *Motion of MFN Partners, LP and Mobile Street Holdings, LLC for Entry of an Order Converting the Debtors' Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court").

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must be in writing, filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 3rd Floor, 824 N. Market Street, Wilmington, Delaware 19801, on or before **May 20, 2025 at 4:00 p.m.** (ET) (the "Objection Deadline"), and served upon and received by the undersigned counsel for MFN.

PLEASE TAKE FURTHER NOTICE that, if any objections to the Motion are received, the Motion and such objections shall be considered at a hearing before the Honorable Craig T. Goldblatt at the Bankruptcy Court, 824 N. Market Street, 3rd Floor, Courtroom #7, Wilmington, Delaware 19801 on **June 16, 2025 at 4:00 p.m. (ET)**.

PLEASE TAKE FURTHER NOTICE that, copies of the Motion, and other information

¹ A complete list of each of the debtors in these chapter 11 cases (the "Debtors") may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 10990 Roe Avenue, Overland Park, Kansas 66211.

regarding these chapter 11 cases are available for inspection free of charge on Epiq Corporate Restructuring, LLC's website at <https://dm.epiq11.com/YellowCorporation>. The Motion is also available for a fee at the Court's website at <http://www.deb.uscourts.gov>. A login identification and password to the Court's Public Access to Court Electronic Records ("PACER") are required to access this information and can be obtained through the PACER Service Center at <http://www.pacer.psc.uscourts.gov>. Copies of the Motions and other documents filed in these cases also may be examined between the hours of 9:00 a.m. and 4:30 p.m., prevailing Eastern Time, Monday through Friday, at the office of the Clerk of the Bankruptcy Court, United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801.

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 29, 2025
Wilmington, Delaware

Respectfully Submitted,

/s/ L. Katherine Good

L. Katherine Good (No. 5101)
POTTER ANDERSON & CORROON LLP
1313 N. Market Street, 6th Floor
Wilmington, Delaware 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
Email: kgood@potteranderson.com

– and –

**QUINN EMANUEL URQUHART & SULLIVAN,
LLP**

Eric Winston (*pro hac vice* admitted)
865 S. Figueroa Street, 10th Floor
Los Angeles, CA 90017
Telephone: (213) 443-3000
Facsimile: (213) 443-3100
Email: ericwinston@quinnemanuel.com

*Counsel for MFN Partners, LP and Mobile Street
Holdings, LLC*